

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
:  
**MOTORS LIQUIDATION COMPANY, et al.,** : **09-50026 (REG)**  
**f/k/a General Motors Corp., et al.** :  
:  
**Debtors.** : **(Jointly Administered)**  
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**NOTICE OF MATTERS SCHEDULED  
FOR HEARING ON SEPTEMBER 7, 2010 AT 9:45 A.M.**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton U.S. Custom House, before the Honorable Robert E. Gerber, United States Bankruptcy Judge, Courtroom 621, One Bowling Green, New York, NY 10004-1408

**I. CONTESTED MATTERS:**

A. Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of their Engagement Letter with AP Services, LLC [**Docket No. 6362**]

Responses Filed:

1. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of their Engagement Letter with AP Services, LLC [**Docket No. 6451**]
2. Fee Examiner's Response and Motion to Defer the Consideration of Debtors' Request for an Award to AP Services, LLC of a Success Fee and a Retroactive Hourly Rate Increase [**Docket No. 6497**]
3. Response of the United States Trustee to Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of Their Engagement Letter with AP Services, LLC [**Docket No. 6517**]

Replies Filed:

4. Reply of Motors Liquidation Company to Objection of United States Trustee, Objection of Unsecured Creditors Committee, and the Response and Motion to Defer of Fee Examiner to (A) Application by AP Services, LLC for Approval of Success Fee and (B) Motion by Debtors to Amend Terms of Their Engagement Letter with AP Services, LLC [**Docket No. 6546**]
5. Fee Examiner's Supplemental Response and Motion to Defer an Award of a Retroactive Hourly Increase [**Docket No. 6819**]

Additional Document(s):

6. Declaration of Thomas Moers Mayer in Support of The Debtors' Motion for an Order Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of Their Engagement Letter with AP Services, LLC [**Docket No. 6648**]
7. Declaration of Amy Caton in Support of The Debtors' Motion for an Order Pursuant to 11 U.S.C. § 363 Authorizing the Debtors to Amend the Terms of Their Engagement Letter with AP Services, LLC [**Docket No. 6649**]
8. Declaration of Albert A. Koch in Support of Motion to Amend the Terms of the Engagement Letter of AP Services, LLC [**Docket No. 6694**]
9. Declaration of Stephen H. Case in Support of Motion to Amend the Terms of the Engagement Letter of AP Services, LLC [**Docket No. 6705**]

Status: This matter is going forward.

B. Application by AP Services, LLC as Crisis Managers to the Debtors for Approval of the Success Fee [**Docket No. 6363**]

Responses Filed:

1. Fee Examiner's Response and Motion to Defer the Consideration of Debtors' Request for an Award to AP Services, LLC of a Success Fee and a Retroactive Hourly Rate Increase [**Docket No. 6497**]
2. Objection of the United States Trustee to Application of AP Services, LLC as Crisis Managers for the Debtors for Approval of the Success Fee [**Docket No. 6518**]

3. Fee Examiner's Supplemental Response and Motion to Defer an Award of a Retroactive Hourly Increase [**Docket No. 6819**]

Replies Filed:

4. Reply of Motors Liquidation Company to Objection of United States Trustee, Objection of Unsecured Creditors Committee, and the Response and Motion to Defer of Fee Examiner to (A) Application by AP Services, LLC for Approval of Success Fee and (B) Motion by Debtors to Amend Terms of Their Engagement Letter with AP Services, LLC [**Docket No. 6546**]
5. Response of the United States Trustee Regarding Application by AP Services, LLC, as Crisis Managers to the Debtors for Approval of Success Fee and Reimbursement of Expenses [**Docket No. 6820**]

Additional Document(s):

6. Supplement to Application by AP Services, LLC, as Crisis Managers to the Debtors, for Approval of the Success Fee [**Docket No. 6418**]
7. Second Supplement to Application by AP Services, LLC, as Crisis Managers to the Debtors, for Approval of the Success Fee [**Docket No. 6606**]

Status: This matter is going forward.

C. Motion of Debtors Pursuant to §§ 105, 363, and 365 of the Bankruptcy Code for an Order Authorizing (I) the Debtors to Enter into the Stock Purchase Agreement with General Motors Holdings, S.L., and (II) the Assumption and Assignment of the BMW Contract in Connection with the Debtors' Entry Into the Stock Purchase Agreement [**Docket No. 6688**]

Responses Filed:

1. Limited Objection to Debtors' Motion Pursuant to §§ 105, 363 and 365 of the Bankruptcy code for an Order Authorizing (I) the Debtors to Enter into the Stock Purchase Agreement with General Motors Holdings, S.L., and (II) the Assumption and Assignment of the BMW contract in Connection with the Debtors' Entry into the Stock Purchase Agreement [**Docket No. 6818**]
2. Bayerische Motoren Werke Aktiengellschaft's Objection to Debtors' Motion for an Order Pursuant to §§ 105, 363 and 365 of

the Bankruptcy Code Authorizing, Among Other Things, the Assumption and Assignment of the BMW Contract in Connection with the Debtors' Entry into a Stock Purchase Agreement with General Motors Holdings, S.L. [Docket No. 6828]

3. Supplement to Limited Objection to Debtors' Motion Pursuant to §§ 105, 363, and 365 of the Bankruptcy Code for an Order Authorizing (I) the Debtors to Enter into the Stock Purchase Agreement with General Motors Holdings, S.L., and (II) the Assumption and Assignment of the BMW Contract in connection with the Debtors' Entry into the Stock Purchase Agreement [Docket No. 6837]

Replies Filed:

4. Reply of Debtors to Limited Objection of Punch Corporation to Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for an Order Authorizing (I) the Debtors to Enter into the Stock Purchase Agreement with General Motors Holdings, S.L., and (II) the Assumption and Assignment of the BMW Contract in Connection with the Debtors' Entry into the Stock Purchase Agreement [Docket No. 6848]

Additional Documents: None at this time.

Status: This matter is going forward.

Dated: New York, New York  
September 2, 2010

/s/ Stephen Karotkin \_\_\_\_\_  
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Stephen Karotkin  
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